

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

**TRUSTEES OF THE PLUMBERS AND
PIPEFITTERS NATIONAL PENSION FUND,**

Plaintiffs,

v.

**PAUL S. YONEY, INC. a/k/a YONEY
INCORPORATED, et al.,**

Defendants.

Civil Action No. S96-2427

**MOTION TO POSTPONE AND RESCHEDULE
HEARING ON ORDER TO SHOW CAUSE**

Now come the Defendants, Paul S. Yoney, Inc. a/k/a Yoney Incorporated, et al., by their attorneys, and respectfully request that the Court postpone and reschedule the hearing on the Order to Show Cause presently set for April 16, 2003 at 10:00 a.m., to a date convenient to the Court, on or after May 16, 2003, and in support thereof state as follows:

1. The undersigned counsel has just been retained to represent the Defendants in this matter.
2. The parties have been involved in settlement negotiations that have resolved some issues, but need additional time to determine whether the remaining issues can be resolved. A thirty-day postponement will provide the necessary time to determine if settlement is possible.
3. Counsel for Defendants has been informed by counsel for Plaintiffs, John R. Harney, Esq., that Plaintiffs have no objection to this request.

WHEREFORE, Defendants respectfully request that their motion be granted, and that the hearing on the Motion to Show Cause be postponed and rescheduled for a date convenient to the Court,

on or after May 16, 2003. An appropriate Order is attached.

Respectfully submitted,

EPSTEIN BECKER & GREEN, P.C.

/s/ Brian Steinbach

Brian Steinbach

Bar No. 24849

1227 25th Street, N.W.

Suite 700

Washington, D.C. 20037

(202) 861-1870

DATED: April 15, 2003

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Defendants' Motion to Postpone and Reschedule Hearing on Order to Show Cause was served this 15th day of April, 2003, by electronic service, on the following:

John R. Harney
O'Donoghue & O'Donoghue
4748 Wisconsin Avenue, N.W.
Washington, D.C. 20016

Attorneys for Plaintiffs

/s/ Brian Steinbach

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ORDER

AND NOW, this day of April, 2003, upon consideration of Defendants' Motion to Postpone and Reschedule Hearing on Order to Show Cause, and the entire record herein, it is

ORDERED, that the Motion to Postpone and Reschedule Hearing on Order to Show Cause is granted, and it is further

ORDERED, that the date for the hearing on the Order to Show Cause is hereby changed to _____, 2003, at _____.

Dated: _____, 2003

United States District Judge

Copies to:

John R. Harney
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4748 Wisconsin Avenue, N.W.
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Attorneys for Plaintiffs

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